

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
20 TITLE INSURANCE COMPANY, and TICOR TITLE OF
21 NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

24 Gary L. Compton, State Bar No. 1652
25 2950 E. Flamingo Road, Suite L
26 Las Vegas, Nevada 89121

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST
COMPANY,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 2:21-CV-01854-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Chicago Title Insurance Company ("Chicago Title") and Ticor Title of Nevada, Inc. ("Ticor Agency") (collectively "Defendants") and plaintiff Deutsche Bank National Trust Company ("Deutsche

1 Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as
2 follows:

3 1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial
4 District Court for the State of Nevada;

5 2. On October 6, 2021, Chicago Title removed the instant case to the United States
6 District Court for the State of Nevada (ECF No. 1);

7 3. Chicago Title’s and Ticor Agency’s respective responses to Deutsche Bank’s
8 complaint are currently due on January 24, 2022, while FNTG’s response is currently due on
9 January 25, 2022;

10 4. Counsel for Defendants request a 30-day extension for Chicago Title and Ticor
11 Agency (29 days for FNTG) through and including Wednesday, February 23, 2022, for
12 Defendants to file their respective responses to Deutsche Bank’s complaint to afford Defendants’
13 counsel additional time to review and respond to Deutsche Bank’s complaint.

14 5. Counsel for Deutsche Bank does not oppose the requested extension;

15 6. This is the first request for an extension made by counsel for Defendants, which is
16 made in good faith and not for the purposes of delay.

17 7. This stipulation is entered into without waiving any of Defendants’ objections
18 under Fed. R. Civ. P. 12.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Wednesday, February 23, 2022.

3 Dated: January 19, 2022

SINCLAIR BRAUN LLP

4
5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE GROUP,

INC., CHICAGO TITLE INSURANCE

8 COMPANY, and TICOR TITLE OF

NEVADA, INC.

9 Dated: January 19, 2022

WRIGHT FINLAY & ZAK, LLP

10
11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON

Attorneys for Plaintiff

13 DEUTSCHE BANK NATIONAL TRUST

COMPANY

14 **IT IS SO ORDERED.**

15 Dated this 20th day of January, 2022.

16 
17 _____
18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE
20
21
22
23
24
25
26
27
28